

O'NEILL / HASSEN

Attorneys at Law

September 11, 2019

VIA Email

Daniel Tracer
Andrea Griswold
US Attorney's Office
1 Saint Andrews Plaza
New York, NY 10007

RE: *United States v. Tuzman*, 15 Cr. 536 (PGG)

Dear Mr. Tracer and Ms. Griswold:

I write pursuant to Judge Gardephe's order to request discovery in advance of the *Fatico* hearing regarding Omar Amanat's alleged obstruction of justice. In our letter to the Court, dated August 28, 2019, we gave a list of some of the discovery to which we believe we are entitled. I formalize and expand our request below.

- 1) Messages.** We formally request all messages in the following categories:
 - a. From Spyros Enotiades to Omar Amanat or Irfan Amanat, via email, text, Whats App, or any other messaging service. This includes messages that are under assumed or different names or different identities.
 - b. Any messages between Spyros Enotiades and other 'clients' or parties about Omar Amanat. This includes messages from Spyros Enotiades to Kola Aluko, Johny Quaicoe, Vladamir Dronin, Vincent Schifano, Marlin Merin, or Ricardo Czystopalek.
 - c. Any messages between Spyros and anyone relating to Mr. Aluko's properties or any properties which formerly belonged to Mr. Aluko or his subsidiaries.
 - d. Any other communications the government has access to about Mr. Amanat, including communications with Kasowitz Benson Torres, LLP, or any other law firm about Mr. Amanat.
- 2) Prior Trial Testimony.** Please provide us with Spyros Enotiades' prior testimony, whether under an assumed name or his own name.
- 3) Benefits and Payment.** Please provide us with records of payment the government has made to Spyros Enotiades or his wife. We request records of monetary payment by any branch of the federal government, immigration benefits, records of communication or documentation between any branch of the Justice Department and the Treasury Department regarding Mr. Enotiades's non-payment of taxes. Documentation and information about any

other form of remuneration, including, but not limited to: housing, phone, and travel.

- 4) **Agent notes and communications.** Please provide us with all communications between Mr. Enotiades (whether via text, email, or messaging service) and agents either working on this case or regarding Mr. Amanat. Including all messages or communications between Mr. Enotiades and Ed Rom and messages or communications between Mr. Enotiades and John Levanis or any other agents with whom Mr. Enotiades communicated about Mr. Amanat.
- 5) **Meeting notes.** Please provide all notes from meetings in any case where Mr. Enotiades discussed Mr. Amanat. Please provide all notes from the case in which Mr. Enotiades traveled to Thailand and Australia in April and May of 2017.
- 6) **Bank accounts.** Please provide meeting notes and Mr. Enotiades' communications from matters in which Mr. Enotiades alleged that someone asked him to create a bank account or in which the government and Mr. Enotiades did indeed create a bank account. This includes Mr. Enotiades' participation in *USA v. Hernandez-Solarte*, 18 Cr. 262 (VEC).
- 7) **Information specific to Mr. Enotiades' work for the government.**
 - a. **Confidential Source Registration.** Information regarding Mr. Enotiades' confidential source registration, including his initial sustainability determination and any continuing suitability determinations from the FBI, DEA, or any other government agencies.
 - b. **CI Status.** What is Mr. Enotiades' status as an informant? Is he a high-level informant?
 - c. **Government handlers.** Who are Mr. Enotiades's handlers? Which confidential informant coordinators are assigned to Mr. Enotiades?
 - d. **Illegal activity.** Has Mr. Enotiades been approved for Otherwise Illegal Activity from any agency?
 - e. **Deactivation.** Has Mr. Enotiades ever been deactivated as a Confidential Source?
 - f. **Subsources.** How many subsources has Mr. Enotaides ever signed up? What is the procedure he follows for signing up sub-sources? Please provide any bank account records or methods of payment that Mr. Enotiades has received for payment from sub sources.
 - g. **Disclosure of private payments.** When and how did the government learn that Mr. Enotiades formed a private consulting firm? What are the parameters or rules governing the overlap between Mr. Enotiades's private work and government work? Any information about payments people have made to Mr. Enotiades in order to receive a benefit from

the government. Any information about money that Mr. Enotiades has received from people who later were signed up as sub-sources. Please provide any information about payments from private clients to Mr. Enotiades.

- h. **Awards or Commendations.** Please provide documentation of any awards or commendations that Mr. Enotiades has received.

- 8) ***Brady and Giglio.*** We request the production of any exculpatory information, including any impeachment evidence.

- 9) ***Any other information.*** Any other information to which we are entitled.

I sincerely appreciate your attention to this matter. I am hoping to schedule a follow-up call in advance of the date the Court has set for a report on the discovery; please let me know when you are available.

Kind regards,

/s/

Grainne E. O'Neill